

## MOSES & SINGER LLP

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May 12, 2010

*# ECF 5/13/10 JN*  
**VIA FACSIMILE ONLY**

Honorable James S. Gwin  
United States District Court  
Carl B. Stokes United States Court House  
801 West Superior Avenue  
Cleveland, Ohio 44113-1838

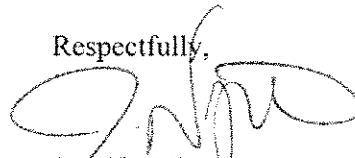
Re: *Melinda Serin, Judson Russ, Long Soui Lim, Peri Kettler, Gordon Redner, and Thomas J. Smith, v. Northern Leasing Systems, Inc., Jay Cohen, Rich Hahn, and Sara Krieger*  
Docket No. 06 CV 1625 (JSG)

Your Honor:

This firm represents defendants Northern Leasing Systems, Inc. ("NLS"), Jay Cohen, Rich Hahn and Sara Krieger in the referenced matter. We write with the consent of plaintiffs' counsel, Krishnan Chittur, Esq. of Chittur & Associates LLP, to make a joint request for an extension of not more than 30 days to complete depositions in this case.

Pursuant to Your Honor's Order dated April 16, 2010, and, subsequently, the telephonic status conference with Your Honor and plaintiffs' counsel on April 20<sup>th</sup>, Your Honor ordered the parties to complete depositions of plaintiffs and defendants by the end of this month. Currently, we have scheduled depositions in May for 3 of the 6 plaintiffs. Defendant Richard Hahn is scheduled for surgery this week; he will not be available for deposition until June. Defendant Jay Cohen is also unavailable until June. Additionally, according to plaintiffs' counsel, plaintiff Thomas Smith cannot travel to New York for his deposition due to a physical disability. We are trying to work out a mutually acceptable alternative with plaintiffs' counsel for the deposition of Mr. Smith. Plaintiffs' counsel has also informed us that despite several efforts, they have been unable to get in touch with plaintiff Peri Kettler. Because of the foregoing scheduling issues, counsel for plaintiffs and for defendants jointly request an extension of not more than 30 days to complete depositions in this case, through the end of June, 2010.

Respectfully,



Jennifer Nigro

cc. Chittur & Associates (via facsimile)  
*Attorneys for Plaintiffs*